

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 16-2738 (MAS) (RLS) JUDGE MICHAEL A. SHIPP MAG. JUDGE RUKHSANAH L. SINGH
THIS DOCUMENT RELATES TO: GERALDINE KELLY, Plaintiff(s), v. JOHNSON & JOHNSON and JOHNSON & JOHNSON CONSUMER INC. Defendants.	Civil Action No. 3:19-cv-08494 RESPONSE TO AUGUST 15, 2024 ORDER TO SHOW CAUSE (DKT. 33096)

Sara Beth Craig of Peiffer Wolf Carr Kane Conway & Wise, LLP, counsel of record for Plaintiff Travis Robert Kelly, Executor of the Estate of GERALDINE KELLY, submits the following Response to the Court’s August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On March 13, 2019, a Short Form Complaint was directly filed on behalf of Plaintiff Geraldine Kelly in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiff’s Profile Form (“PPF”) Order, a Plaintiff Profile Form, core records, and signed medical records authorization were required to be served upon Defendants via MDL Centrality by a certain date. Unfortunately, Plaintiff Geraldine Kelly died during the pendency of the second bankruptcy, and a new executor had to be appointed to act in her stead. Executor Travis Kelly was appointed and completed the Plaintiff Profile Form, which was served via MDL Centrality on April 15, 2024. An

Amended Short Form Complaint was filed on April 16, 2024. As such, Plaintiff respectfully requests that the Court not dismiss the case with prejudice.

Dated: April 16, 2025

Respectfully submitted,

/s/ Sara Beth Craig

Sara Beth Craig

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed through the Court's CM/ECF system on April 16, 2025, which shall send notification of such filing to all CM/ECF participants.

/s/ Sara Beth Craig
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